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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

EDD H. AHRENS, an individual,

Plaintiff,

v.

RASHAD RATLIFF, an individual; PERFECT
PRIVACY, LLC, a limited-liability company;
WEB.COM GROUP, INC., a Delaware
corporation; UPLEA S.A.R.L., a company
organized under French law; DSTORAGE
S.A.S.U., a company organized under French
law; JOHANN THIESSON, an individual; and
YOHAN TORDJMAN, an individual,

Defendants.

Case No.: 2:16-cv-1114

**JOINT MOTION TO DISMISS
COMPLAINT WITHOUT PREJUDICE
AS TO RASHAD RATLIFF AND ORDER
THEREON**

Plaintiff Edd H. Ahrens (“Plaintiff”), by and through his counsel, GIBSON LOWRY LLP, and Defendant Rashad Ratliff (“Mr. Ratliff”), in proper person, hereby move that the Complaint filed by Plaintiff Edd H. Ahrens **as to Mr. Ratliff only**, shall be dismissed without prejudice, with the respective parties to bear their own costs and attorney’s fees, in accordance with the agreement entered into between Plaintiff and Mr. Ratliff on or about June 14, 2016 (the “Settlement Agreement”).

Plaintiff and Mr. Ratliff stipulate that the United States District Court for the District of Nevada shall retain jurisdiction to enforce the Settlement Agreement in the event that Ratliff breaches this Agreement or defaults on any of Mr. Ratliff’s obligations in any manner, and that

1 this Court shall retain jurisdiction with respect to the case-in-chief to vacate the Dismissal, allow
2 Ahrens to reinvigorate Ahrens' claims against Mr. Ratliff as if the Dismissal never occurred, and
3 allow Ahrens to sue Mr. Ratliff for breach and/or default of this Agreement, with Mr. Ratliff
4 hereby waiving any statute of limitations and/or jurisdictional defense of any nature.

5
6 Dated this 13th day of July, 2016.

Dated this 13th day of July, 2016.

7
8 GIBSON LOWRY LLP

RASHAD RATLIFF

9 /s/ J.D. Lowry.

/s/ Rashad Ratliff

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Mr. Rashad Ratliff
2636 Oakmere Drive
Harvey, Louisiana 70058
13 Defendant In Proper Person

14
15 The parties having so moved, and good cause appearing,

16
17 **IT IS SO ORDERED:**

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19
20 

21 RICHARD F. BOULWARE, II
22 UNITED STATES DISTRICT JUDGE

23 DATED: March 6, 2017

CERTIFICATE OF SERVICE

Pursuant to Local Rule 5 of this Court, I certify that I am an employee of GIBSON LOWRY LLP and that on this 13th day of July, 2016, I caused a correct copy of the foregoing **JOINT MOTION TO DISMISS COMPLAINT WITHOUT PREJUDICE AS TO RASHAD RATLIFF AND ORDER THEREON** to be served via CM/ECF to:

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/s/ David White

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